

STATE OF NEW JERSEY
DEPARTMENT OF BANKING AND INSURANCE

IN THE MATTER OF:

Proceedings by the Commissioner of Banking	)	
and Insurance, State of New Jersey, to fine	)	CONSENT
TD Paulistano LLC, Reference No.1519107	)	ORDER
and Thiago DeFreitas, Reference No.1091163	)	

To: TD Paulistano LLC
50 Harrison St., 4th Floor
Hoboken, NJ 07030 6040

Thiago DeFreitas
14 Stevenson Place
Kearney, NJ 07032-1620

This matter, having been opened by the Commissioner of Banking and Insurance ("Commissioner"), State of New Jersey, upon information that TD Paulistano Limited Liability Company ("TD Paulistano"), previously licensed resident public adjuster entity and Thiago DeFreitas ("DeFreitas"), currently licensed as a resident public adjuster, pursuant to N.J.S.A. 17:22B-5; may have violated various insurance laws of the State of New Jersey; and

WHEREAS, TD Paulistano and DeFreitas (collectively the "Respondents") are subject to the Public Adjusters' Licensing Act, N.J.S.A. 17:22B-1 to -20 ("The Public Adjusters' Act"), and the regulations governing the licensing of public adjusters, N.J.A.C. 11:1-37.1 to -37-19; and

WHEREAS, pursuant to N.J.S.A. 17:22B-14a(1) and N.J.A.C. 11:1-37.14(a)1 and 2, a public adjuster shall not violate any provision of the insurance law, including any rules promulgated by the Commissioner, or violate any law in the course of his-, or its, dealings as a public adjuster; and

WHEREAS, pursuant to N.J.A.C. 11:1-37-13(b) 3(ii), the written memorandum or contract between a licensed public adjuster and an insured shall prominently include a section which specifies: a list of services to be rendered and the maximum fees to be charged, which fees shall be reasonably related to the service rendered; and

WHEREAS, pursuant to N.J.A.C. 11:1-37-13(b) 3(iii), the written memorandum or contract between a licensed public adjuster and an insured shall prominently include a section which specifies: the time and date of execution of the contract (day, month, year) by each party; and

WHEREAS, the Respondents entered into ninety-seven public adjuster contracts with New Jersey insureds, from July 13, 2019 to May 10, 2023, for the adjustment of insurance claims; and

WHEREAS, the ninety-seven contracts failed to provide a list of services to be rendered and failed to provide the time of contract execution, in violation of N.J.A.C. 11:1-37.14(a) 1 and 2, N.J.A.C. 11:1-37.13(b) 3(ii) and N.J.A.C. 11:1-37.13(b) 3(iii); and

IT FURTHER APPEARING, the Respondents:

- 1) Have admitted responsibility for the violations; and
- 2) Have cooperated with the investigation conducted by the New Jersey Department of Banking and Insurance ("Department"); and
- 3) Have asserted that the violations cited in this Consent Order were not willful; and

WHEREAS, cause does exist under N.J.S.A. 17:22B-17 to impose a fine; and

WHEREAS, the Respondents have waived their right to a hearing on the aforementioned violations and consent to the payment of a fine in the amount of nine thousand seven hundred dollars (\$9,700.00); and

WHEREAS, this matter should be resolved upon the consent of the Parties without resort to a formal hearing;

NOW, THEREFORE, IT IS on this 15 day of June, 2026

ORDERED AND AGREED, that the Respondents pay a fine in the amount of \$9,700.00 to the Department; and

IT IS FURTHER ORDERED and AGREED that said fine shall be paid by certified check, cashier's check, or money order made payable to the "State of New Jersey, General Treasury," with an initial payment of \$270.00 due and payable immediately upon execution of this consent order by Respondent and thirty-four (34) subsequent monthly payments of \$270.00 due and payable on or before the 16th day of each month thereafter; and the final payment of \$250.00 due and payable on or before the 16th day of month thereafter; and

IT IS FURTHER ORDERED AND AGREED, that the signed Consent Order, together with the subsequent monthly payments, shall be remitted to:

New Jersey Department of Banking and Insurance
Attention: Thomas Stanley – Manager/Enforcement Unit
9th Floor, Consumer Protection Services, Enforcement
P. O. Box 329
Trenton, New Jersey 08625-329

and;

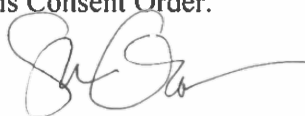
IT IS FURTHER ORDERED AND AGREED, that in the event full payment of the civil penalty is not made in accordance with this Order, the Commissioner may exercise any and all remedies available by law, including but not limited to, recovery of any unpaid penalties in summary proceedings, in accordance with the penalty enforcement law, N.J.S.A. 2A:58-10 to 12; and

IT IS FURTHER ORDERED AND AGREED, that the civil penalties in this Consent Order are imposed pursuant to the police powers of the State of New Jersey for the enforcement of the

law and the protection of the public health, safety and welfare, and is not intended to constitute debts which may be limited or discharged in a bankruptcy proceeding; and

IT IS FURTHER ORDERED AND AGREED, the provisions of this Consent Order represent a final agency decision and constitute a final resolution of the violations contained herein; and

IT IS FURTHER ORDERED AND AGREED, that the Respondents shall cease and desist from engaging in the conduct that gave rise to this Consent Order.



Susan Ochs
Acting Commissioner

Consented to as to Form,
Entry and Content:

By:



Thiago DeFreitas, Sublicensee of
TD Paulistano Limited Liability Company



Thiago DeFreitas, Individually

Date:

05/29/2026